

## **EXHIBIT 2**

9/17/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.  
Highly Confidential - Attorneys' Eyes Only

Melanie Kambadur

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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Richard Kadrey, et al., )  
Individual and Representative )  
Plaintiffs, ) CASE NO.  
 ) 3:23-cv-03417-VC  
-against- )  
 )  
Meta Platforms, Inc., )  
Defendant. )  
)

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\*\*\* HIGHLY CONFIDENTIAL \*\*\*

ATTORNEYS' EYES ONLY  
VIDEO-RECORDED DEPOSITION OF  
MELANIE KAMBADUR

Cooley, LLP  
55 Hudson Yards  
New York, New York 10001

09/17/2024  
9:07 a.m. (EDT)

REPORTED BY: MONIQUE CABRERA

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DIGITAL EVIDENCE GROUP  
1730 M Street, NW, Suite 812  
Washington, D.C. 20036  
(202) 232-0646

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██████████

3 A. Yes.

4 Q. Who was that person?

5 A. Nikolay Bashlykov.

6 Q. And he lives in London?

7 A. I'm not actually sure where he  
8 lives. He works from the London office.

9

██████████

11 A. No.

15 MR. WEINSTEIN: Object to form.

16 A. I don't recall.

17 BY MR. YOUNG:

21 Would that be fair to say?

22 A. I don't know if I would say it that.

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1       We said he worked on pre-processing the data,  
2       that is fair to say.

3           Q.       What is pre-process -- processing?  
4       Excuse me.

5           A.       That means transforming the data  
6       with a series of steps that make it more suitable  
7       for training models.

8           Q.       Does that include removing -- strike  
9       that.

10           What kind of steps would be involved  
11      in pre-processing?

12           A.       Are you asking specifically for  
13      Llama models or more generally?

14           Q.       Yeah, for the whole Llama models.

15           A.       I don't know all the steps. But for  
16      example, we perform various types of  
17      de-duplication. We tokenize the data, which  
18      means -- yeah, we tokenize the data. We chunk  
19      the data into spans of text.

20           Q.       Let's talk about de-duplication. So  
21      if the models -- if a model is trained or  
22      pre-trained on the same text over and over again,

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1 CERTIFICATE OF SHORTHAND REPORTER NOTARY PUBLIC

2 I, Monique Cabrera, the officer  
3 before whom the foregoing deposition was  
4 taken, do hereby certify that the foregoing  
5 transcript is a true and correct record of  
6 the testimony given; that said testimony was  
7 taken by me stenographically and thereafter  
8 reduced to typewriting under my direction;  
9 and that I am neither counsel for, related  
10 to, nor employed by any of the parties to  
11 this case and have no interest, financial or  
12 otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto  
14 set my hand this 17th day of September, 2024.

15

16

17



18

19 MONIQUE CABRERA

20 Notary Public in and for the State of New York

21 County of Suffolk

My Commission No.

22 Expires: 06/12/2026